MOSES LAKE INDUSTRIES, INC. RECEIVED



8248 Randolph Rd. NE Moses Lake, WA 98837 Phone: (599) 762-5386 2005 Half 32 (509) 762-598:

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March 15, 2005 8etto -0305 - 15970	RECEI MAR 17
TSCA Confidential Business Information Center (7407M)	
EPA East - Room 6428 Attn: Section 8(e)	. c.
U.S. Environmental Protection Agency 1201 Constitution Avenue, NW	8
1201 Constitution Avenue, NW	
Washington, DC 20004-3302	

Re: TSCA 8(e) Substantial Risk Notice for Tetramethylammonium hydroxide (TMAH)

Dear Administrator:

Moses Lake Industries, Inc. (MLI) is timely reporting information in accordance with TSCA Section 8(e) that a chemical substance, tetramethylammonium hydroxide (TMAH), may present a substantial risk of injury to health or the environment. MLI is a high purity specialty chemical manufacturer. TMAH (CAS No. 75-59-2) is primarily used in the electronics and semiconductor industry for computer chip-manufacturing processes. Please note that TMAH is included on the EPA 1994 List of HPV Additions.

MLI has recently received preliminary data from MB Research Laboratories, Spinnerstown, PA, based on studies for acute dermal and acute oral toxicity in rats that indicate both dermal and oral toxicity for TMAH. These studies are summarized as follows:

Dermal

For the dermal study, 25% TMAH (25% TMAH) was tested. The animals were dosed as follows: three female rate at 2000 mg/kg; three female rats at 1000 mg/kg; and five female and five male rats at 500 mg/kg. All of the animals at 2000 mg/kg and 1000 mg/kg died on the first day, and five out of five females and three out of five males in the 500 mg/kg group died by the fifth day of the test. Another group of five female and five male rats are being dosed at 50 mg/kg for the acute dermal toxicity test to arrive at an LD_{50} range for acute dermal toxicity.

Acute oral toxicity is being tested on two different concentration ranges of TMAH: 25% TMAH and AD-200 (2.38% TMAH). Five female and five male rats were dosed by oral gavage at 500 mg/kg. For 25% TMAH, four out of five female and five out of five male rats died by the fifth day of the study. For 2.38% TMAH, all ten of the animals survived the fifth day of the study. Another group of five female and five male rats are being dosed at 50 mg/kg for the acute oral toxicity test to arrive at an LD₅₀ range for acute oral toxicity.





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Based on these preliminary results, 25% TMAH exhibits LD_{50} toxicity in rats somewhat below 500 mg/kg by both oral and dermal routes. We are extending the testing to arrive at a more definitive LD_{50} determination, and will forward the results when the final test report is available.

Attached is a preliminary summary of the results from MB Research Laboratories.

If you have any questions, please contact me at the MLI location indicated above.

Sincerely,

Michael Harvey

Executive Vice President/ General Counsel

Moses Lake Industries

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MB Research Laboratories

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1765 wentz road, p.o. box 178 spinnerstown, pa 16966 phone (215) 536-4110 fax (215) 536-1816 info@mbressarch.com

March 7, 2005

Mr. Jim Blanchard Moses Lake Industries 10198 Dean Drive Manassas, VA 20110

RE: Project Numbers MB 13179.01, MB 13180.01 and MB 13180.02

Dear Mr. Blanchard:

The dermal toxicity evaluation of 25% TMAH (MB 05-13180.02) was started on March 2, 2005. All three female rats died following the 2000 mg/kg and 1000 mg/kg administrations. Additionally, three out of five male and five out of five females died following the 200 mg/kg administration. A group of five male and five female rats will be dosed dermally at 50 mg/kg on March 9, 2005.

The oral toxicity evaluation of the 25% TMAH (MB 05-13180.01) was started on March 3, 2005. Five of five male and four of five female rats died following the 500 mg/kg administration. A group of five male and five female rats will be dosed at 50 mg/kg on March 8, 2005.

At this time all ten animals (five males and five females) dosed with 500 mg/kg of AD-200 (MB 05-13179.01) survived the dosing. No additional testing is planned at this time.

If you have any questions, please call.

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Sincerely,

Daniel R. Cerven, M.S. Director of Laboratories

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